Newsletter of the Utah Prosecution Council

The PROSECUTOR

RECENT CASES

United States Supreme Court

Appropriate Strickland analysis asks whether the state court could reasonably find that defense counsel's actions were not unreasonable

Richter was convicted of murder related to a home invasion robbery. During the trial, prosecution called an expert in blood pattern evidence to rebut the defense counsel's theory of self-defense. However, defense counsel did not present expert testimony that could have cast doubt on the prosecution's expert testimony.

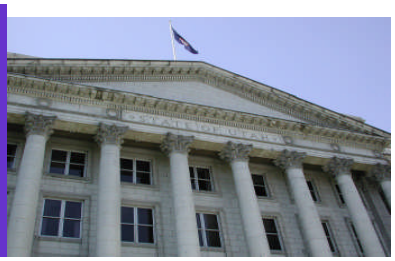
Richter sought habeas relief from the California Supreme Court asserting ineffective assistance of counsel but was denied. Richter then filed for federal habeas relief, only to be denied by the District Court. The denial was affirmed by the Ninth Circuit, but was reversed on en banc review which examined the ineffective assistance claim de novo. The en banc review found that the state court could not have denied the claim reasonably in light of defense counsel's failure to consult experts regarding the blood evidence.

The Supreme Court reversed holding that the Ninth Circuit en banc did not give proper deference to the state court's determination. Further, the California Supreme Court summary order was an adjudication on the merits that limited federal review under 28 U.S.C. § 2254(d).

The Supreme Court also held that Richter failed to demonstrate an unreasonable application by the state court of the Strickland standard in his ineffective assistance of counsel claim. The appropriate Strickland analysis under 28 U.S.C. § 2254(d) is not whether counsel behaved unreasonably and it resulted in prejudice, but whether the state court could reasonably find that defense counsel's actions were not unreasonable or that they did not cause prejudice. *Harrington v. Righter*, 131 S.Ct. 770.

Continued on page 2

In This Issue:



Continued from page 1

Federal habeas relief granted only for state court's unreasonable application of clearly established Federal law

Respondent Moore attacked and fatally shot a victim. On the advice of counsel, Moore agreed to plead no contest to felony murder in exchange for the minimum sentence. He could have been charged with aggravated murder. He later sought post-conviction relief in state court, claiming ineffective assistance of counsel. He complained that his lawyer had not moved to suppress his confession to police before accepting the offer.

The state court concluded that Moore did not establish ineffective assistance of counsel under *Strickland* v. *Washington* , 466 U. S. 668. Moore then sought federal habeas relief. Habeas relief may not be granted with respect to any claim a state-court has found on the merits unless the state-court decision denying relief involves "an unreasonable application" of "clearly established Federal law, as determined by" the court. The District Court denied the petition, but the Ninth Circuit reversed.

The Supreme Court reversed the Ninth Circuit and held that the state court decision was not an unreasonable application of either part of the *Strickland* rule. The Court found that the state court was not unreasonable to accept that counsel's failure to suppress the confession was justified as being futile in light of Moore's other admissible confession. Also, for Moore to prevail in state court, he had to show "a reasonable

Continued on page 3

Case Summary Index

Continued from page 2

probability that, but for counsel's errors, he would not have pleaded guilty and would have insisted on going to trial." *Hill* v. *Lockhart*. The state court reasonably could have determined that Moore would have accepted the plea agreement even if his police confession had been ruled inadmissible. Also, because Moore faced the possibility of grave punishments, counsel's bargain for the conviction's minimum sentence was thus favorable. *Premo v. Moore*, 131 S.Ct. 733.

Utah Supreme Court

Automatic waiver statute is not unconstitutional

16 year old Angilau was charged with murder as an adult. The district court asserted jurisdiction under Utah's automatic waiver statute, which states that "[t]he district court has exclusive original jurisdiction over all persons 16 years of age or older charged with . . . an offense which would be murder or aggravated murder if committed by an adult." Utah Code Ann. § 78A-6-701(1) (Supp. 2010).

Angilau moved to dismiss the criminal information for lack of jurisdiction, arguing that the automatic waiver statute is unconstitutional. The Utah Supreme Court first held that the statute does not violate due process rights because Angilau had no fundamental right to treatment in the juvenile system. The court reasoned that the juvenile system is a legislative creation, and the legislature can choose to exclude certain minors from that system so long as the exclusion is not arbitrary or impermissibly discriminatory.

The court then held that the statute does not violate equal protection rights under the Utah or U.S. constitutions. The court reasoned that although the statute creates a disparate treatment based on the classification of age, such treatment was reasonably related to a legitimate state purpose. *State v. Angilau*, 2011 UT 3.

Rule 24 of the Utah Rules of Criminal Procedure is not applicable to a pretrial evidentiary ruling

Before going to trial on drug-related charges, Bozung moved to suppress his oral and written admissions, asserting that he had not been properly Mirandized. The district court granted Mr. Bozung's motion to suppress. The State then moved to reopen the suppression motion in order to present additional evidence that Bozung was in fact properly Mirandized. The district court denied the motion, holding that, pursuant to rule 24 of the Utah Rules of Criminal Procedure, it had no discretion to reopen the suppression hearing absent newly discovered evidence.

On appeal, the Utah Supreme Court held that the district court erroneously denied the State's motion because rule 24 is not applicable to a pretrial evidentiary ruling. The court further held that district courts have broad discretion and should consider the totality of the circumstances in determining whether to grant the State's motion to rehear a defendant's suppression motion. *State v. Bozung*, 2011 UT 2.

Utah Court of Appeals

Collective knowledge doctrine for probable cause

After having probable cause to arrest Talbot, the Garfield County Sheriff called a deputy in the area and told him to detain Talbot if he saw him. While the sheriff went to get a search warrant, the deputy crossed paths with Talbot. Instead of simply detaining Talbot, the deputy arrested him and found drugs in a search incident to the

Continued on page 5

PROSECUTOR PROFILE

Rena Barbiero Beckstead

Deputy Salt Lake District Attorney, (Unit Chief Administrative Services)

Rena Barbiero Beckstead strives to be loyal and dependable in the workplace, and caring, involved, and loving in the home. It doesn't take much for one to realize that she is exactly just that.

Rena was raised in a strict and loving Italian family that was filled with wonderful traditions and, most importantly, good food. Her father immigrated to the United States from Italy following World War ll. Rena credits her parents as inspiring her to work hard, educate herself, and understand the difference between right and wrong.

In fact, what caused her to want to be a lawyer ever since 3rd grade was the notion, rooted in her upbringing, that "doing the wrong thing would have consequences." She also thought that since she was very stubborn, loved to argue, and always had an opinion, then she had the attributes necessary to be a good lawyer.

Rena has spent her entire legal career at Salt Lake County. She is currently the Deputy Salt Lake District Attorney for the Unit Chief Administrative Services, and her assignments include legal services to the County Mayor, Surveyor, Clerk, and the divisions of Human Resources, Contracts and Procurement, Fleet, Information Services, and Facilities Management. The most challenging experience of her career was arguing an asset forfeiture case that went up on appeal to the Utah Supreme Court. The most rewarding experience was when she was recognized as the Wasatch Area Law Enforcement Association's Civilian Employee of the Year in 1988 for her efforts on behalf of the law enforcement's asset forfeiture cases.

One of her favorite in-court memories occurred in a Third District Court room when a defense attorney accused her of misrepresenting facts to the Court. As she jumped to her feet to defend herself, the judge reassured the defense attorney that he knew she would never lie to the Court.

It's no surprise that Rena believes that the most important quality of a good attorney is a reputation of honesty and fairness. She credits her work for making her more compassionate, and she says the most satisfying aspect of her job is the people she gets to work with every day.

One of her most life-changing assignments was back in 1987 when she was assigned to the Metro Narcotics Strike Force to handle drug related asset forfeiture cases. It was then when she met her husband, a Sergeant with the Department of Public Safety also assigned to the Metro Narcotics Strike Force. Both were first drawn to each other as they saw how each one conducted their professional and personal lives. He finally asked her out in 1990 and they were married four years later.

Rena has one son, an energetic 14 year old freshman at Judge Memorial High School. She spends most of her free time transporting him to his baseball, basketball and track practices and attending his games. In fact, because her son loves baseball so much, she spends her vacations traveling with him to cities where major stadiums are located to watch baseball games. Consequently, she has been to places that never would have made her list of vacation destinations, but she's never been disappointed. From her experience, each city has interesting and unique things to do.

Rena also has three remarkable step-sons ages 31, 28, and 25. Between them they have honorably served five tours of duty in Iraq and Afghanistan. Enough said.

Finally, what better way to end Rena's profile than with her own words of advice: "I think we should remember that we are charged with doing the public's business. Our own personal agenda has no place in the decisions we make and should not influence the way we practice government law. We have an awesome responsibility to those who we serve and we owe it to them to do our best every day."

BIRTHPLACE - SLC, UT

FIRST JOB - Wendy's

FAVORITE FOOD - filet mignon

FAVORITE TREAT - Twix

FAVORIT BOOK - *Into Thin Air*

FAVORITE SPORTS TEAM - Pittsburgh Steelers

FAVORITE SINGER - Josh Groban

FAVORITE GAME - Phase Ten

FAVORITE QUOTE OR WORDS OF WISDOM: "Ability without honor is useless."

Continued from page 3

arrest.

Talbot claimed the search was unconstitutional because the deputy did not have probable cause to arrest him based on the deputy's own knowledge at the time. However, the appellate court concluded that as long as Talbot's arrest was supported by probable cause, the fact that the deputy may have exceeded the sheriff's instructions has no bearing on whether Talbot's arrest was "lawful." Moreover, the court concluded that the arrest was supported by probable cause based on all the facts and circumstances known to the sheriff and his law enforcement team, of which the arresting deputy was a part, and the knowledge of the deputy's fellow officers was imputed to the deputy under the collective knowledge doctrine. *State v. Talbot*, 2010 UT App 352.

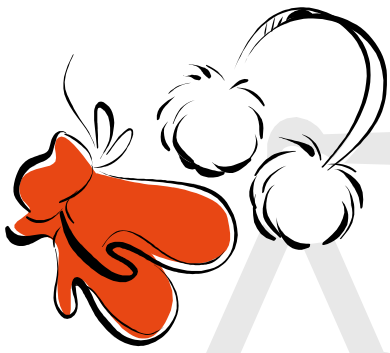
Court cannot suspend statute-mandated sentencing

After pleading guilty for failing to register as a sex offender pursuant to Utah Code § 77-27-21.5 (16)(a)(i), the defendant was sentenced a one-year jail term. However, the district court then immediately suspended all of the jail and placed the defendant on eighteen months of probation.

In response, the State appealed to challenge the legality of the district court's sentence. The appellate court held that the district court's suspension of the defendant's sentencing was illegal because Utah Code section 77-27-21.5(16) mandates a sentencing of at least ninety days in jail. *State v. Dana*, 2010 UT App 374.

California DUIs count as prior convictions

In 2007, Rajo was arrested for DUI. Because Rajo had been previously convicted twice of DUI in California, he was charged with DUI with prior convictions, a third degree felony. See Utah Code Ann.§ 41-6a-503. Rajo moved to dismiss the felony classification, arguing that the California convictions do not meet the requirements for enhancement under Utah law. The trial court denied Rajo's motion to dismiss.



On appeal, the court affirmed the lower court's decision due to Utah Code Ann. § 41-6a-501(2)(viii), which states that a "conviction" for purposes of the enhancement statute includes convictions for violations of "statutes or ordinances . . . in effect in any other state . . . which would constitute a violation of [the Utah DUI statute]." The court determined that the reach of the Utah DUI statute was greater than the California DUI statute, making it so that while some behavior constituting a DUI under the Utah DUI statute may not constitute a violation of the California DUI statute, all violations of the California DUI statute do constitute violations of the Utah DUI statute. *State v. Rajo*, 2010 UT App 360.

To be held in contempt, person must know what was required

As part of C.A's juvenile court probation, C.A's mother agreed that she would be held in contempt if she willfully failed to comply with the court order to "attend meetings with the probation department, school officials, mental health providers or others as directed and ensure transportation is provided." Three days after the probation order, the Probation Officer contacted Mother and told her to bring C.A. to juvenile detention as soon as C.A. came home from school. Instead, Mother took C.A. to the detention center a few days later.

The juvenile court found Mother in contempt for failing to obey the probation order. The appellate court reversed. "As a general rule, in order to prove contempt for failure to comply with a court order it must be shown that the person cited for contempt knew what was required, had the ability to comply, and

Continued on page 6

Continued from page 5

intentionally failed or refused to do so." *Von Hake v. Thomas*, 759 P.2d 1162, 1172 (Utah 1988). The appellate court held that the juvenile court's contempt order was not supported by sufficient evidence that Mother "knew what was required." The court reasoned that the probation order's language is not so clear as to have given Mother notice that she was required by court order to take C.A. to juvenile detention upon the probation officer's directive. Nor did the probation officer or the juvenile court ever inform Mother that the probation order encompassed such situations. *State v. L.A.*, 2010 UT App 356.

Prosecutor's comments about the defense's lack of evidence is not 5th amendment violation

One of Nguyen's arguments on appeal, after being convicted of sexually abusing his step-daughter, was that the prosecutor's statements characterizing Stepdaughter's testimony as "uncontested," "unimpeached," and "the only evidence" the jury had, improperly commented on Nguyen's invocation of his Fifth Amendment right to remain silent.

The government is permitted to comment on the failure of the defense to counter or explain the evidence, and its closing remarks will only be held to violate the defendant's Fifth Amendment rights if they "were of such a character that the jury would naturally and necessarily construe them to be a comment on the defendant's failure to testify." *State v. Tillman*, 750 P.2d 546, 554 (Utah 1987). Therefore, the appellate court ruled against Nguyen and held that it was appropriate for the prosecutor to highlight for the jury that the defense had presented no evidence supporting any of the alleged motivations. The court reasoned that while some of the prosecutor's more general comments—including that Stepdaughter's testimony was "the only evidence" before the jury and that her testimony was uncontested—may have reminded the jury that Nguyen did not testify, it was still proper for the prosecutor to comment on the "paucity or absence of evidence" presented by the defense to contradict Stepdaughter's testimony or to establish a motive for Stepdaughter to fabricate. See *Nelson-Waggoner*, 2004 UT 29, ¶ 31. *State v. Nguyen*, 2011 UT App 2.

Newly built, unoccupied home up for sale is not a 'dwelling'

In January 2008, McNearney was arrested at the scene of a break-in at a recently constructed and as yet unoccupied house. The house was totally functional and had been on the market for approximately four months and had been shown to various potential buyers. McNearney was subsequently charged with one count of burglary of a dwelling.

The trial court denied McNearney's motion for a directed verdict to reduce the burglary charge from a second to a third degree felony, arguing that the unoccupied house did not constitute a dwelling for purposes of the burglary statute as interpreted by *State v. Cox*, 826 P.2d 656 (Utah Ct. App. 1992).

On appeal, the court concluded that the never-occupied house that McNearney burglarized did not, as a matter of law, meet the definition of a dwelling for purposes of Utah's burglary statute. The court reasoned that the house had never been occupied or used for overnight lodging and therefore was not "usually occupied by a person lodging [therein] at night," see Utah Code Ann. § 76-6-201(2) (2008). See also *Cox*, 826 P.2d at 662. Rather, as an empty, never-occupied house for sale on the retail market, it was much more analogous to the "stores,

Continued on page 7

Continued from page 6

business offices, or garages" that *Cox* concluded were not entitled to enhanced protection as dwellings under the statute. *State v. McNearney*, 2011 UT App 4.

To preserve issue for appeal, court must be given an adequate opportunity to address it

McDaniel appealed from his forgery and attempted theft convictions, arguing that the trial court erred by refusing to merge the two charges. To preserve an issue for appeal, (1) the issue must be raised in a timely fashion, (2) the issue must be specifically raised, and (3) the challenging party must introduce supporting evidence or relevant legal authority. *438 Main St. v. Easy Heat, Inc.*, 2004 UT 72, ¶ 51, 99 P.3d 801.

To prove that the issue was preserved for appeal, McDaniel pointed to counsel's statement during trial: "And so I would say probably there's a merger issue with the attempted theft count and would ask that the Court enter a directed verdict on that count." The appellate court held that although the record reflects that defense counsel mentioned the possibility of a merger issue, this was not sufficient to preserve the issue for appeal as the issue was not raised to a level of consciousness to allow the trial court an adequate opportunity to address it; nor did counsel introduce supporting evidence or relevant legal authority. *State v. McDaniel*, 2010 UT App 381.

Alibi defense is not an affirmative defense

After being convicted of murdering his wife, one of Lynch's arguments on appeal was that his alibi defense was an affirmative defense and, as a result, the trial court should have "separately instruct[ed] [the] jury clearly that the State must disprove . . . affirmative defenses[] beyond a reasonable doubt." See *State v. Garcia*, 2001 UT App 19, ¶ 16, 18 P.3d 1123.

The appellate court held that an alibi defense is not a separate, affirmative defense that carries its own burden of proof. An affirmative defense is "[a] defendant's assertion of facts and arguments that, if true, will defeat the plaintiff's or prosecution's claim, even if all the allegations in the complaint are true." *Black's Law Dictionary* 482 (9th ed. 2009). An alibi defense, on the other hand, is simply a refutation of the State's case-in chief, that is, "an alibi defense challenges the State's ability to prove the statutory elements." *State v. Fulton*, 742 P.2d 1208, 1213. Therefore, the appellate court ruled that the trial court did not improperly instruct the jury. *Utah v. Lynch*, 2011 UT App 1.

The Utah Prosecution Council

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On the Lighter Side

In the field of law, we work alongside with smart people. Often, we find ourselves comparing ourselves to our peers, wishing we were as smart as the other guy. Every once in awhile, it's good to hear about...well...the not-so-smart members of the public. Here are ten such people—to remind us that we're not so bad after all...

1. When his 38-caliber revolver failed to fire at his intended victim during a hold-up in Long Beach, California, would-be robber James Elliot did something that can only inspire wonder. He peered down the barrel and tried the trigger again. This time it worked.

2. The chef at a hotel in Switzerland lost a finger in a meat-cutting machine and, after a little shopping around, submitted a claim to his insurance company. The company expecting negligence sent out one of its men to have a look for himself. He tried the machine and he also lost a finger. The chef's claim was approved.

3. A man who shoveled snow for an hour to clear a space for his car during a blizzard in Chicago returned with his vehicle to find a woman had taken the space. Understandably, he shot her.

4. After stopping for drinks at an illegal bar, a Zimbabwean bus driver found that the 20 mental patients he was supposed to be transporting from Harare to Bulawayo had escaped. Not wanting to admit his incompetence, the driver went to a nearby bus stop and offered everyone waiting there a free ride. He then delivered the passengers to the mental hospital, telling the staff that the patients were very excitable and prone to bizarre fantasies. The deception wasn't discovered for 3 days.

5. An American teenager was in the hospital recovering from serious head wounds received from an oncoming train. When asked how he received the injuries, the lad told police that he was simply trying to see how close he could get his head to a moving train before he was hit.

6. A man walked into a Louisiana Circle-K, put a $20 bill on the counter, and asked for change. When the clerk opened the cash drawer, the man pulled a gun and asked for all the cash in the register, which the clerk promptly provided. The man took the cash from the clerk and fled, leaving the $20 bill on the counter. The total amount of cash he got from the drawer... $15. [If someone points a gun at you and gives you money, is a crime committed?]

7. Seems an Arkansas guy wanted some beer pretty badly. He decided that he'd just throw a cinder block through a liquor store window, grab some booze, and run. So he lifted the cinder block and heaved it over his head at the window. The cinder block bounced back and hit the would-be thief on the head, knocking him unconscious. The liquor store window was made of Plexiglas. The whole event was caught on videotape.

8. As a female shopper exited a New York convenience store, a man grabbed her purse and ran. The clerk called 911 immediately, and the woman was able to give them a detailed description of the snatcher. Within minutes, the police apprehended the snatcher. They put him in the car and drove back to the store. The thief was then taken out of the car and told to stand there for a positive ID. To which he replied, "Yes, officer, that's her. That's the lady I stole the purse from."

9. The Ann Arbor News crime column reported that a man walked into a Burger King in Ypsilanti, Michigan, at 5 A.M., flashed a gun, and demanded cash. The clerk turned him down because he said he couldn't open the cash register without a food order. When the man ordered onion rings, the clerk said they weren't available for breakfast. The man, frustrated, walked away.

10. When a man attempted to siphon gasoline from a motor home parked on a Seattle street, he got much more than he bargained for. Police arrived at the scene to find a very sick man curled up next to a motor home near spilled sewage. A police spokesman said that the man admitted to trying to steal gasoline and plugged his siphon hose into the motor home's sewage tank by mistake. The owner of the vehicle declined to press charges saying that it was the best laugh he'd ever had.

2011 Training Calendar

UTAH PROSECUTION COUNCIL AND OTHER LOCAL CLE TRAININGS

March 15-18	TRAIN THE TRAINERS *Training experienced prosecutors to be excellent trainers and instructors*	Courtyard by Marriot Layton, UT
April 12-13	24TH ANNUAL CRIME VICTIMS CONFERENCE *Sponsored by Utah Council on Victims of Crime. For more info: Call (801) 238-2370; E-mail: judyblack@utah.gov; or click www.crimevictim.utah.gov*	Radisson Hotel Salt Lake City, UT
April 28-29	SPRING CONFERENCE *Case law and 2011 legislative update, ethics, civility and more.*	South Towne Expo Sandy, UT
May	REGIONAL LEGISLATIVE UPDATE SESSIONS *24 legislative update sessions for cops and prosecutors*	24 locations in all areas of the state
May 17-19	ANNUAL CJC / DOMESTIC VIOLENCE CONFERENCE *Workers against all types of interpersonal violence get to mingle and learn*	Zermatt Resort Midway, UT
June 23-24	UTAH PROSECUTORIAL ASSISTANTS ASSOCIATION CONFERENCE *Substantive training for non-legal staff in prosecution offices*	Riverwood Conf. Cntr. Logan, UT
August 4-5	UTAH MUNICIPAL PROSECUTORS ASSOCIATION SUMMER CONF. *The annual opportunity for municipal prosecutors to gather for mutual training*	La Quinta Inn Moab, UT
August 15-19	BASIC PROSECUTOR COURSE *Substantive and trial advocacy training for new and newly hired prosecutors*	University Inn Logan, UT
September 14-16	FALL PROSECUTOR TRAINING CONFERENCE *The annual training and interaction event for all the state's prosecutors*	Yarrow Hotel Park City, UT
October 19-21	GOVERNMENT CIVIL PRACTICE CONFERENCE *Training and interaction for civil side public attorneys*	Zion Park Inn Springdale, UT
November 17-18	COUNTY/DISTRICT ATTORNEYS EXECUTIVE SEMINAR *Elected and appointed county/district attorneys meet in conjunction with UAC*	Dixie Center St. George, UT
Nov. 30 - Dec. 2	ADVANCED TRIAL SKILLS TRAINING *Substantive and trial advocacy training for experienced prosecutors*	Location pending

Training *continued on page 11*

2011 Training Calendar

NATIONAL ADVOCACY CENTER (NAC)

A description of and application form for NAC courses can be accessed by clicking on the course title.

Effective February 1, 2010, The National District Attorneys Association will provide the following for NAC courses: course training materials; lodging [which includes breakfast, lunch and two refreshment breaks]; and airfare up to $550. Evening dinner and any other incidentals are NOT covered.

April 3-8 — CHILDPROOF — Summary — Register — NAC Columbia, SC
Intensive course for experienced child abuse prosecutors
The registration deadline is February 18, 2011.

See the table — TRIAL ADVOCACY I — Summary — Register — NAC Columbia, SC
A practical, "hands-on" training course for trial prosecutors

Course Date	*Registration Deadline*
April 11-15	*February 11, 2011*
May 2-6	*not yet posted*
June 13-17	*not yet posted*
July 25-29	*not yet posted*
September 25-30	*not yet posted*

May 16-20
August 15-19 — PROSECUTOR BOOTCAMP — Summary — Register — NAC Columbia, SC
An introduction to prosecution — ***Registration deadlines not yet posted***

July 18-21 — COURTROOM TECHNOLOGY — Summary — NAC Columbia, SC
Upper Level PowerPoint; Sanction II; Audio/Video Editing (Audacity, Windows Movie Maker); 2-D and 3-D Crime Scenes (SmartDraw, Sketchup); Design Tactics
Registration deadline not yet posted

August 1-4 — CROSS EXAMINATION — Summary — NAC Columbia, SC
A complete review of cross examination theory and practice
Registration deadline not yet posted

September 19-23 — FALL CONFERENCE — Summary & registration not posted — Columbia, SC

2011 Training Calendar

NATIONAL DISTRICT ATTORNEYS ASSOCIATION COURSES* AND OTHER NATIONAL CLE CONFERENCES

April 3-7	PROSECUTING HOMICIDE CASES	Summary	Register	San Francisco, CA
April 4-8	EQUAL JUSTICE FOR CHILDREN	Summary	Register	San Diego, CA
April 10-14	EXPERIENCED PROSECUTOR COURSE	Summary	Register	Orlando, FL
May 2-6	INVESTIGATION AND PROSECUTION OF CHILD FATALITIES AND PHYSICAL ABUSE Agenda	Summary	Register	Indianapolis, IN
June 5-14	CAREER PROSECUTOR COURSE	Summary	Register	Charleston, SC
June 20-24	UNSAFE HAVENS I			Portland, OR
July 11-13	SafetyNet (In conjunction with AOL)			Dulles, VA
July 15-20	NDAA SUMMER COMMITTEE & BOARD MEETINGS & CONFS.			Sun Valley, ID
August 22-26	UNSAFE HAVENS II			Location Pending
August - Sept	DEMYSTIFYING SMART DEVICES			Location Pending

* For a course description, click on the "Summary" link after the course title. If an agenda has been posted there will also be an "Agenda" link. Registration for all NDAA courses is now on-line. To register for a course, click on the "Register" link. If there are no "Summary" or "Register" links, that information has not yet been posted on the NDAA website.